- (3) select n to be 0 instead of 1;
- (4) select J to be of Formula (2) instead of Formula (3) or (4);
- (5) select R⁵ to be H insead of alkyl, substituted alkyl, alkoxy, halogen, CN, ureido or NHCOR⁶;
- (6) select R¹ and R⁴ to be H instead of alkyl or substituted alkyl;
- (7) select X to be of Formula (5) instead of (6) or (7);
- (8) select Z to be $-NR^8R^9$ instead of OR^7 or SR^7 ;
- (9) select R⁸ to be H instead of any of the many other possibilities mentioned;
- (10) make R⁹ a group of Formula –(CH₂)_xSO₃H.

Regarding point (10) above, the applicants note that Gregory et al. do not disclose or even remotely suggest including such a group on the central triazine ring.

The applicants respectfully submit that the vastly broad Formula (1) of Gregory et al. does not, and cannot, fairly suggest dyes of Formula (1) according to the present claims. As earlier noted, there is no teaching, suggestion or motivation in Gregory et al. to make all of the above-noted changes which would be necessary to reach the applicants' invention. The unobviousness of the applicants' invention is emphasized by the highly useful light fastness and ozone fastness which characterize the applicants' dyes. Gregory et al. refer to water fastness but are not in any sense suggestive of the light fastness and ozone fastness.

It is noted that the Examiner has made specific mention of Gregory et al.

Example 5. However, in order to get from this dye to the present claims, one would need to

- (1) replace one, and only one, of the 3,5-dicarboxyphenylamino groups by a sulphonaphthalene group;
- (2) replace not one, but both, of the Y groups by H;
- (3) replace one of the ethanol groups in X with H; and
- (4) replace the other ethanol group in X with –(CH₂)_xSO₃H, despite such a group not being contemplated in Gregory et al.

The applicants respectfully submit that Gregory et al. do not suggest or provide motivation for the combination of replacements and changes needed to reach the applicants' invention and there is certainly nothing in Gregory et al. to suggest the advantageous properties the applicants have found for their compounds.

Consistent with the foregoing, the applicants submit that claims 1-7 define subject matter which is not in any sense obvious from Gregory et al. Accordingly, favorable reconsideration with allowance is requested.

Respectfully submitted,

MORGAN LEWIS & BOCKIUS LLP

By Paul N. Kokulis

Reg. No. 16773

Date: June 27, 2006

Customer No. 09629 1111 Pennsylvania Avenue, N.W.

Washington, D.C. 20004 Phone: (202) 739-3000 Facsimile: (202) 739-3001

Direct: (202) 739-5455